

**GOTTLIEB & ASSOCIATES PLLC**  
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January 28, 2025

**VIA ECF**

The Honorable Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Murphy v. University Of The Cumberlands, Inc.*  
Case No.: 1:24-cv-7755

Dear Judge Woods,

The undersigned represents James Murphy, on behalf of himself and all other persons similarly situated ("Plaintiff") in the above referenced matter against Defendant, University Of The Cumberlands, Inc., ("Defendant"). The undersigned respectfully requests that the Initial Conference scheduled for February 13, 2025, at 3:00 PM (Dkt. 4) be adjourned for 60 days because the Defendant was recently served (Dkt. 7) and their counsel has not yet answered or appeared in this action. This request will grant ample time for the Defendant to appear and discuss a possible resolution with Plaintiff's Counsel. This is the Plaintiff's first request for an extension.

Respectfully submitted,

GOTTLIEB & ASSOCIATES PLLC

/s/Michael A. LaBollita, Esq.  
Michael A. LaBollita, Esq.